

 ORIGINAL

Jabbar Sachet Al-Khafagi #10877333
3405 Deer Park Drive SE
Salem, OR 97310
Plaintiff, *pro se*

FILED APR 13 10 24 AM 2019

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF OREGON

JABBAR SACHET AL-KHAFAGI,

Case No. 3:19-cv-00669-MO

Petitioner,

vs.

DECLARATION IN SUPPORT
OF MOTION FOR
APPOINTMENT OF COUNSEL

CHARLES C. SUNG, MD, et al.,

Defendants.

I, JABBAR SACHET AL-KHAFAGI, being first duly sworn on oath, depose and say:

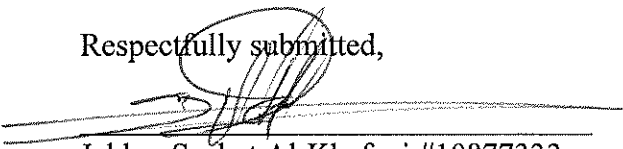
1. I am over 18-years of age, of sound mind, and competent to testify to the matters declared herein.
2. The English language is not my first language and I have a limited base from which to pursue this action on my own.
3. A prison legal assistant has helped me prepare everything to this point
4. The legal issues in this case are complex, involving complicated interpretations of state statutes and federal constitutional principles. I have a limited knowledge of the law.
5. I am unable to afford counsel as is shown by the declaration submitted in the application to proceed *informa pauperis*.
6. I will be at a serious disadvantage if I cannot receive the assistance of counsel in preparation of this action. As noted, everything filed to date has been by and through a legal assistant within the Oregon Department of Corrections.

7. Further basis upon which this motion is grounded exists by reason of my limited knowledge and experience, and the conditions of the imprisonment under which I labor to challenge the unconstitutionality of actions by DOC employees.

Pursuant to 28 U.S.C. § 1746(2), I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

DATED this 25th day of April, 2019.

Respectfully submitted,



Jabbar Sachet Al-Khafagi #10877333

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Plaintiff, *pro se*